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14 IN THE UNITED STATES DISTRICT COURT  
15 EASTERN DISTRICT OF CALIFORNIA  
16

17 CAROLE S. TALAN

No. 2:05-CV-00109-FCD-PAN

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Plaintiff,

19 vs.

JOINT STIPULATION, REQUEST  
AND ORDER TO EXTEND TIME  
FOR EXPERT DISCLOSURE

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METROPOLITAN LIFE INSURANCE  
COMPANY,

Complaint Filed: January 19, 2005

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Defendant.

Trial Date: September 19, 2006

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TO THE COURT AND ALL PARTIES OF RECORD:

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Counsel for plaintiff Carole S. Talan and counsel for defendant Metropolitan Life

1 Insurance Company, having met and conferred regarding the expert disclosure, hereby stipulate  
2 and request as follows:

3 Plaintiff and defendant have been engaged in settlement negotiations for several months  
4 and both sides have expectations that this matter may soon settle. In addition, plaintiff's counsel  
5 underwent a total hip replacement on November 28, 2005, which interrupted his normal work  
6 schedule.

7 For the foregoing reasons, IT IS HEREBY STIPULATED THAT the pretrial order be  
8 amended with respect to the time of expert disclosure and completion of experts as follows:

9 All counsel shall designate in writing and file with the court the names of all experts they  
10 propose to tender at trial on or before March 6, 2006. All supplemental designations shall be  
11 made on or before March 27, 2006.

12 It is so agreed and stipulated.

13 Dated: January 6, 2006

deVRIES LAW FIRM

15 By: /s/ Douglas K. deVries  
16 DOUGLAS K. deVRIES  
Attorney for Plaintiff

17 Dated: January 6, 2006

SEYFARTH SHAW

19 By: /s/ Lawrence E. Butler  
20 LAWRENCE E. BUTLER  
Attorneys for Defendant

21 **IT IS SO ORDERED:**

22 Dated: January 6, 2006

By: /s/ Frank C. Damrell Jr.  
23 FRANK C. DAMRELL, Jr.  
United States District Judge